



**VIA ECF**

April 29, 2011

Hon. Kiyo A. Matsumoto  
United States District Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Sandra Barkley v. United Homes, LLC, et al.*, CV-04-0875 (KAM)(RLM)  
*Mary Lodge v. United Homes, LLC, et al.*, CV-05-0187 (KAM)(RLM)  
*R. & S. Gibbons v. United Homes, LLC, et al.*, CV-05-5302 (KAM)(RLM)  
*Dewitt Mathis v. United Homes, LLC, et al.*, CV-05-4386 (KAM)(RLM)  
*Miles and Lisa McDale v. United Homes, LLC, et al.*, CV-05-5362 (KAM)(RLM)  
*Charlene Washington v. United Homes, LLC, et al.*, CV-05-5679 (KAM)(RLM)

Dear Judge Matsumoto:

This office, along with AARP Foundation Litigation and Cowan Liebowitz & Latman, P.C., represents the plaintiffs in the above-referenced consolidated actions. In order to facilitate the presentation of plaintiffs' damages calculations at the close of our case in chief, we write to request the Court's leave to call a paralegal from South Brooklyn Legal Services to present this evidence. The witness will summarize and present a total dollar amount of the actual damages sustained by each plaintiff. All of the numbers underlying the calculations will be based upon designated exhibits and/or testimony previously presented at trial. Plaintiffs anticipate that the presentation of this evidence will require no more than an hour, exclusive of cross-examination and redirect.

**South Brooklyn Legal Services**  
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**John C. Gray**, Project Director

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Plaintiffs are available to discuss this matter should Your Honor so require. We appreciate the Court's consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sara Manaugh', with a stylized, cursive script.

Sara Manaugh